



December 9, 2016

Mr. Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Mr. Poliquin:

Re: Comment on Chartering and Field of Membership, 12 CFR Part 701, RIN 3133-AE31

Alaska USA appreciates the opportunity to comment on the NCUA's Board proposed changes to its chartering and field of membership (FOM) rules. Alaska USA is a federally chartered, multiple common bond credit union with \$6.8 billion in assets, serving over 593,000 members.

Alaska USA supports NCUA's efforts to amend the rules to raise the well-defined local community population cap to 10 million and to use the narrative model to establish a well-defined local community. We recommend the NCUA Board adopt these proposed changes.

We recommend that NCUA explore contiguous geographic boundaries as an option for credit unions serving under-served communities to link additional under-served areas. This approach could provide an easier process for adding new under-served areas and expand credit union services to consumers in those areas.

We encourage NCUA to continue its efforts to provide flexibility and consistency within each charter type when using population limits and well-defined communities and to simplify and streamline its processes for adding new fields of membership.

Thank you for the opportunity to comment on this proposal. Please contact me at (907) 786-2807 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan McCue".

Dan McCue
Senior Vice President,
Corporate Administration